

**From:** Edo McGowan <edo\_mcgowan@hotmail.com>  
**To:** JRamsey-Lewis@waterboards.ca.gov  
**Date:** Friday, June 13, 2008 8:03:12 PM  
**Subject:** FW: Workshop Information & Travel Advisory

A question, originally AB 1481 allowed the following:

AB 1481 requires each regional board, after consulting with the Department of Public Health, and any other party who has requested in writing to be consulted, and after any necessary hearing, to prescribe water reclamation requirements for water that is used or proposed to be used as reclaimed water.

Requires the State Water Resources Control Board (state board) to adopt a general permit applicable to landscape irrigation uses of recycled water on parks, playgrounds, school yards, residential landscaping and unrestricted access (i.e., public) golf courses for which the Department of Public Health has established uniform statewide recycling criteria.

Requires the general permit to include a re-opener based on regulatory or statutory changes affecting the provisions of the permit or where there is substantial evidence of the presence of contaminants in recycled water that pose a threat to water quality or beneficial uses.

A second issue goes to the potential need for a re-opener in a general permit based on new information, including new information related to contaminants that are \_ AB 1481 Page 4 not recognized as regulated pollutants, but for which there may still be a concern regarding threats to water quality, such as historically existed for MTBE and the degrading of state waters prior to the development of regulatory levels controlling its release. The amendments provide some assurance that the presence of such contaminants do not have to await the development of regulatory levels if these are found in recycled waters used for landscape purposes, and instead allow consideration of the these issues through a re-opened general permit.

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These checks and balances related to public health seem to have been amended out. I am especially interested in how "any other party" who has requested in writing to be consulted will be affected by the final language and how input on new medical or scientific findings will be addressed in a transparent fashion?

Thus, as an official question to you and your agency, where is the protection or standing to accomplish the following?

-----"Requires the general permit to include a re-opener based on regulatory or statutory changes affecting the provisions of the permit or where there is substantial evidence of the presence of contaminants in recycled water that pose a threat to water quality or beneficial uses.-----"

As you may be aware, several studies have demonstrated that recycled water as produced under state criteria contains numerous pathogens and many of these are multi-antibiotic resistant. Additionally, this water carried genetic fragments that will confer antibiotic resistance as well as pharmaceuticals that may augment antibiotic resistance.

How can one assure that this water is safe if these issues have not been considered and where are the objective findings to show that this water is free of pathogens and other contaminants, especially if the re-opener clause has been removed?

I would like a prompt answer by your agency to these questions.

Dr Edo McGowan

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> Date: Fri, 13 Jun 2008 16:09:53 -0700  
> From: lyris@swrcb18.waterboards.ca.gov  
> To: edo\_mcgowan@hotmail.com  
> Subject: Workshop Information & Travel Advisory

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> Attached is some additional information regarding the June 18 workshop / scoping meeting for a statewide general permit for landscape irrigation uses of recycled water. For those traveling to the Cal-EPA building to attend the workshop / scoping meeting, please note the travel advisory for Interstate 5 through downtown Sacramento.

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> Jarrod Ramsey-Lewis, PE  
> State Water Resources Control Board  
> Division of Water Quality  
>  
> 916-341-6984  
>  
> JRamsey-Lewis@waterboards.ca.gov  
> www.waterboards.ca.gov

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> \*\*\* TRAVEL ADVISORY \*\*\*\*

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> Visitors to Cal-EPA building should expect traffic delays this summer. Parts of Interstate 5 through the downtown Sacramento area will be closed in June and July during construction. This may affect travel between the Cal-EPA building and the Sacramento International Airport. Check the FIX I-5 Project Web site for more information (<http://www.fixi5.com/>).

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> General Permit program page:

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[http://www.waterboards.ca.gov/water\\_issues/programs/water\\_recycling\\_policy/landscape\\_irrigation\\_general\\_permit.shtml](http://www.waterboards.ca.gov/water_issues/programs/water_recycling_policy/landscape_irrigation_general_permit.shtml)

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> Workshop / Scoping meeting notice:

[http://www.waterboards.ca.gov/water\\_issues/programs/water\\_recycling\\_policy/docs/notice\\_ceqa\\_landirrig](http://www.waterboards.ca.gov/water_issues/programs/water_recycling_policy/docs/notice_ceqa_landirrig)

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> Yours,

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> Robert Anderson

> SWRCB WebSupport

> tel: (916) 341-5950

> email: randerson@waterboards.ca.gov

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If you like crossword puzzles, then you'll love Flexicon, a game which combines four overlapping crossword puzzles into one!  
<http://g.msn.ca/ca55/208>

**CC:** owl@owlfoundation.net